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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**ADMINISTRATIVE MOTION OF
PACIFIC GAS AND ELECTRIC
COMPANY TO FILE UNDER
SEAL PORTIONS OF RESPONSE
TO ORDER REQUESTING
INFORMATION RE ZOGG FIRE
AND ORDER FOR FURTHER
INFORMATION RE ZOGG FIRE**

Judge: Hon. William Alsup

1 Pursuant to Criminal Local Rule 56-1, Pacific Gas and Electric Company
2 (“PG&E”) respectfully submits this Administrative Motion to File Under Seal (the
3 “Administrative Motion”).

4 PG&E makes the following statement in support of its Administrative Motion:

5 1. Counsel for PG&E has reviewed and complied with Civil Local Rule 79-5 and
6 Criminal Local Rule 56-1, which require that if a document or portion thereof is sealable,
7 counsel seeking to file the document or portion of the document under seal must file and serve an
8 administrative motion for a sealing order, accompanied by a declaration establishing that the
9 materials are sealable.

10 2. PG&E seeks to file under seal the entirety of Exhibit 1 to the Declaration of
11 Kate Dyer in Support of Pacific Gas & Electric Company’s Administrative Motion to File Under
12 Seal (the “Dyer Declaration”), which corresponds to Exhibit F to PG&E’s Response to Order
13 Requesting Information re Zogg Fire and Order for Further Information re Zogg Fire (the
14 “PG&E Response”). Specifically, PG&E seeks to redact for safety reasons the names, job titles,
15 and roles of PG&E employees who advised the Officer-in-Charge (“OIC”) for the September 27,
16 2020 Public Safety Power Shutoff (“PSPS”) event.

17 3. Criminal Local Rule 56-1 provides that a sealing order may issue where
18 information, if made available to the public, would compromise the safety of a person. *See*
19 Criminal Local Rule 56-1(b) and Commentary.

20 4. PG&E believes that the safety of the PG&E employees who advised the
21 Officer-in-Charge (“OIC”) for the September 27, 2020 PSPS event and the safety of their family
22 members could be compromised if their names, job titles, and roles are made publicly available
23 as part of the PG&E Response.

24 5. As set forth in the Dyer Declaration, PG&E has observed a dramatic increase
25 in the number of workplace violence events from customers towards employees, including
26 during PSPS events. In addition, PG&E executives who have spoken publicly on behalf of the
27 company with respect to its wildfire mitigation efforts have received death threats.

1 Dated: October 26, 2020

Respectfully Submitted,

2 JENNER & BLOCK LLP
3 Reid J. Schar (*pro hac vice*)

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7 By: 
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11 AND ELECTRIC COMPANY
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